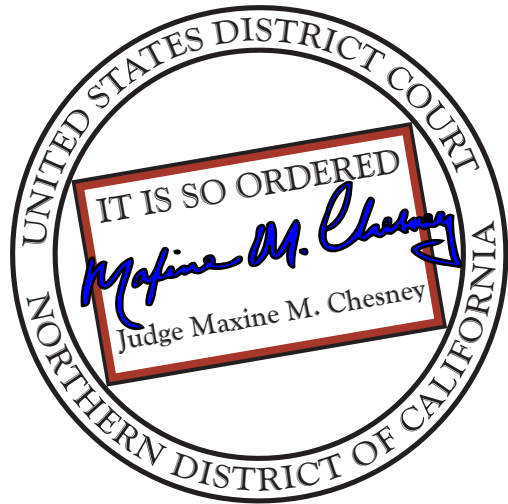


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Dated: September 6, 2013

11
12 **UNITED STATES DISTRICT COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15
16 **SAN FRANCISCO DIVISION**

17 TODD HANSEN,
18 Plaintiff,

19 vs.

20 CLEAR CHANNEL OUTDOOR, INC., a
corporation,

21 Defendants.
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CASE NO. 3:12-CV-05666-MMC

Judge: Maxine M. Chesney
Ctm: 7

**STIPULATION RE: CONTINUANCE OF
MEDIATION COMPLETION DATE**

AND ORDER APPROVING STIPULATION

1 WHEREAS, on April 30, 2013, Plaintiff TODD HANSEN ("Plaintiff"), on the one hand,
2 and Defendant CLEAR CHANNEL OUTDOOR, INC. ("Defendant"), on the other, (collectively,
3 "Party" or "Parties") stipulated to a 75-day continuance of the Mediation Completion Date, then
4 set for May 8, 2013, to July 22, 2013 (the "Stipulation"), with the intention in good faith of
5 scheduling mediation to occur prior thereto;

6 WHEREAS, on May 2, 2013, the Court issued an Order granting continuation of the
7 mediation completion date;

8 WHEREAS, after filing the Stipulation, the Parties then learned that the court-appointed
9 mediator, Martin Quinn, would be out of the country from July 9, 2013 through August 2, 2013,
10 Plaintiff and Plaintiff's counsel were unavailable to conduct mediation throughout June 2013, and
11 the Parties and mediator were not available to conduct mediation on a mutually agreeable date
12 during the first week of July;

13 WHEREAS, in the interest of efficiency and conservation of judicial resources, the Parties
14 continued to work with the mediator to schedule a mutually agreeable mediation date before
15 requesting a second extension in order to ensure that no further extensions would be required;

16 WHEREAS, the Parties diligently worked with the mediator and with one another and set
17 the soonest available date of August 21, 2013 at 9:30 a.m., for which the mediator was only
18 available for a half day of mediation;

19 WHEREAS, shortly thereafter, on August 7, 2013, Plaintiff, Plaintiff's counsel, and
20 Defendant's counsel met and conferred in person and Plaintiff expressed – and Defendant's
21 counsel agreed – that Greg McGrath, Plaintiff's former supervisor, would be an essential party to
22 attend the mediation;

23 WHEREAS, Defendant's counsel conferred with Greg McGrath, who is a resident of
24 Southern California, and he was not available to travel to Northern California on August 21,
25 2013, nor was he available to travel to Northern California on the limited other dates provided by
26 the court-appointed mediator;

27 WHEREAS, in a continuing effort to expedite the scheduling of a mediation, Defendant's
28 counsel conferred with Plaintiff's counsel telephonically and offered instead to hold mediation

privately in Southern California, given that Greg McGrath, Plaintiff, and Defendant's counsel are all located in Southern California, and Plaintiff's counsel was amenable;

WHEREAS, Defendant's counsel requested availability from three private mediators, cleared them with Greg McGrath, and offered these dates to Plaintiff's counsel, but Plaintiff's counsel expressed that he preferred to schedule with the court appointed mediator;

WHEREAS, Defendant requested additional dates from the court appointed mediator, and October 7, 2013, was the only available, mutually agreeable date for the Parties and the mediator to conduct mediation in Northern California;


WHEREAS, on August 27, 2013, the Parties confirmed the mediation in Northern California with mediator Martin Quinn at 11:00 a.m. on October 7, 2013;

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, through their respective undersigned counsel, that, given the October 7, 2013 mediation date, the Parties request that the Court issue an Order continuing the current Mediation Completion Date of July 22, 2013, to October 8, 2013.

SO STIPULATED.


Dated: August 30, 2013

LAW OFFICES OF MARK A. WASSER

By 
MARK A. WASSER
Attorneys for Plaintiff
TODD HANSEN

Dated: August 30, 2013

DLA PIPER LLP (US)

By 
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